

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE )  
TATE, JEREMY S. MELTON, ISSACCA POWELL, )  
KEITH BURGESS, TRAVIS BOYD, TERRENCE )  
DRAIN, and KIMBERLY ALLEN on behalf of )  
Themselves and all similarly situated persons )

PLAINTIFFS, )

v. )

BILL OLDHAM, in his individual capacity as former )  
Sheriff of Shelby County, Tennessee; FLOYD )  
BONNER, JR., in his official capacity as Sheriff of )  
Shelby County, Tennessee; ROBERT MOORE, in his )  
individual capacity as former Jail Director of Shelby )  
County, Tennessee; KIRK FIELDS, in his official )  
capacity as Jail Director of Shelby County, Tennessee; )  
CHARLENE McGHEE, in her individual capacity as )  
former Assistant Chief of Jail Security of Shelby County, )  
Tennessee; REGINALD HUBBARD, in his official )  
capacity as Assistant Chief of Jail Security of Shelby )  
County, Tennessee; DEBRA HAMMONS, in her )  
individual capacity as former Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; TIFFANY )  
WARD in her official capacity as Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; SHELBY )  
COUNTY, TENNESSEE, a Tennessee municipality; )  
TYLER TECHNOLOGIES, INC., a foreign corporation; )  
GLOBAL TEL\*LINK CORPORATION, a foreign )  
corporation; SOFTWARE AG USA, INC., a foreign )  
corporation; and SIERRA-CEDAR, INC., a foreign )  
corporation, SIERRA SYSTEMS GROUP, INC., a )  
foreign corporation; and TETRUS CORP, a foreign )  
corporation )

DEFENDANTS. )

**Case No.: 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY,  
& INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

**NOTICE OF SERVICE OF RESPONSES OF TETRUS CORP. TO THE PLAINTIFFS'  
FIRST SET OF INTERROGATORIES AND DOCUMENT REQUESTS**

Notice is hereby given to the Court and all counsel that Tetrus Corp. has this day served its responses to the Plaintiffs' First Set of Interrogatories and Document Requests.

Respectfully submitted,

/s/ Robert A. McLean

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served on the following counsel of record via the Court's CM/ECF system, this 15<sup>th</sup> day of January, 2020:

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